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MEMORANDUM

DATE: April 30, 1992

SUBJECT: Review of the Preliminary Site Characterization Summary for the McIntosh Plant Site, Olin Corporation, McIntosh, Alabama

FROM: Julie W. Keller *JW Keller*
Toxicologist

TO: Elmer Akin
Health Assessment Officer

REFERENCE: TID 04-9204-085
ESAT-4R-5035
Cheryl Smith, RPM

Per your request, I have reviewed the Preliminary Site Characterization Summary for the McIntosh Plant Site of Olin Corporation in McIntosh, Alabama.

The evaluation of the nature and extent of contamination in OU-1 has focused on groundwater and source evaluation. The lack of a surface soil and contaminant migration investigation at this site is significant. Without surface soil sampling (top one foot) and analysis the direct exposure pathways can not be evaluated in the baseline risk assessment. The Revised Sampling and Analysis Plan should be further revised to incorporate the sampling necessary to evaluate the direct exposure pathways.

The presence of non-TCL chlorinated benzenes (i.e., trichlorobenzene and tetrachlorobenzene isomers, pentachlorobenzene, and pentachloronitrobenzene) as Tentatively Identified Compounds (TIC) in groundwater and sediment samples is relevant to this investigation based on Olin's manufacture of pentachloronitrobenzene. These compounds should be added to the contaminants of concern list and future samples collected in all media at the site should be analyzed for these compounds by requesting the analysis in addition to CLP TCL/TAL through special analytical services (SAS). These compounds should be included in the baseline risk assessment since all have reference doses and/or cancer slope factors.

Section 4.1.2.1, Results of the RI Onsite Sampling, should include a discussion of the following proposed MCL's (PMCL) and treatment technique action levels (TTAL): Beryllium 1 ug/L (PMCL), Copper 1,300 ug/L (TTAL), Lead 15 ug/L (TTAL), and Nickel 100 ug/L (PMCL).

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The pesticides detected in basin sediments and fish should not be excluded as contaminants of concern because the source is from other-than-Olin. The baseline risk assessment should include all contaminants at a site regardless of source. Therefore CLP TCL pesticides and PCBs should be included in all future analysis of samples collected for OU-2.

If I can be of further assistance or if you have any questions please contact me at x1586.